

MEMO ENDORSED



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JOSEPH ZANGRILLI
Senior Counsel
Phone: (212) 356-2657
Fax: (212) 356-3509
jzangril@law.nyc.gov

November 7, 2023

VIA ECF

Honorable Jessica G. L. Clarke
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Anacelis Martinez, as the parent and natural guardian of A.J. (a minor) v. City of New York et al., 23-CV-6303 (JGLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to the defense of the above-referenced matter. In that capacity, I write on behalf of the parties, in accordance with the Court's October 17, 2023 Order.

First, the parties have conferred and are amenable to discussing settlement and respectfully request the Court to refer the matter to a Magistrate Judge. Second, the parties respectfully request one additional week to provide the Court with a proposed protective order. While the parties have met and conferred regarding the proposed protective order and are in agreement on a large portion of the stipulation, a limited number of items remain outstanding. The parties believe the additional time will allow them to reconcile any issues and to avoid the need for Court intervention.

Accordingly, the parties respectfully request that the Court refer the matter to a Magistrate Judge for settlement purposes and to grant a one-week extension of time to provide the Court with a proposed protective order from November 7, 2023 until November 14, 2023.

Application GRANTED. The parties' deadline to submit a proposed protective order is extended to **November 14, 2023**. The Court will refer the matter to Magistrate Judge Willis for settlement purposes. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 29.

Dated: November 13, 2023
New York, New York

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

Thank you for your consideration herein.

Respectfully submitted on behalf of the
parties,

/s/

Joseph Zangrilli
Senior Counsel

Cc: Joshua Moskovitz, Esq. (*Via ECF*)
Brian Buckmire, Esq. (*Via ECF*)
Calla Ketchens, Esq. (*Via ECF*)